

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

OLLIE GREENE, Individually as the  
surviving parent of WYNDELL GREENE,  
SR., WILLIAM GREENE, as the  
Administrator of the Estate of WYNDELL  
GREENE, SR., and MARILYN BURDETTE-  
HARDEMAN, Individually and as the  
surviving parent of LAKEYSHA GREENE,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION,  
TOYOTA MOTOR ENGINEERING &  
MANUFACTURING NORTH AMERICA,  
INC., TOYOTA MOTOR SALES USA, INC.  
VOLVO GROUP NORTH AMERICA, INC.  
VOLVO TRUCKS NORTH AMERICA, a  
DIVISION OF VOLVO GROUP NORTH  
AMERICAN, LLC., STRICK  
TRAILERS, LLC, JOHN FAYARD  
MOVING & WAREHOUSE, LLC and  
DOLPHIN LINE, INC.

Defendants.

CAUSE NUMBER 3:11-cv-0207-N

JURY TRIAL DEMANDED

**APPENDIX TO DEFENDANT STRICK TRAILERS, LLC'S BRIEF IN OPPOSITION  
TO PLAINTIFFS' MOTION IN LIMINE # 23 (SEVERITY OF ACCIDENT)**

Defendant STRICK TRAILERS, LLC ("Strick") files this Appendix in Support of its  
Brief in Opposition to Plaintiffs' Motion in Limine # 23 (Severity of Accident, respectfully  
showing:

EXHIBIT	DESCRIPTION	PAGE NUMBERS
A	Deposition Burton - <i>Kennon, et al v. Lee, et al</i>	1-2

Respectfully submitted,  
DAWSON & CLARK, P.C.

/s/ Donald H. Dawson, Jr.

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WALTERS, BALIDO & CRAIN, LLP

/s/ S. Todd Parks

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**ATTORNEYS FOR DEFENDANT  
STRICK TRAILERS, LLC**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 4, 2014, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Donald H. Dawson, Jr.

DONALD H. DAWSON, JR.

1           IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
2                                 STATE OF MISSOURI

3       BRENDA KENNON, ET. AL.,       )  
4                                 Plaintiffs,       )  
5                                 vs.                )  
6       GILSTER-MARY LEE, ET. AL.,    )  
7                                 Defendants.       )  
8  
9  
10  
11  
12  
13

CIVIL ACTION FILE

NO. 042-007264

14                                 DEPOSITION OF  
15                                 JOSEPH L. BURTON, M.D.  
16                                 ALPHARETTA, GEORGIA  
17                                 TUESDAY, JUNE 6, 2006  
18  
19  
20  
21  
22

23       REPORTED BY: TANYA L. VERHOVEN-PAGE,  
24                                 CCR-B-1790

25       FILE NO.   421445

1 record.)

2 BY MR. COLE:

3 Q I'm showing you Exhibit 15. That appears  
4 to be a single article published in 1997 by the  
5 Society of Automotive Engineers entitled  
6 Relationships Between Crash Casualties and Crash  
7 Attributes; is that right?

8 A Yes, sir. This is an article -- it's SAE  
9 article 970393 that we put in every file that's a  
10 frontal crash, basically, or a rear end crash or a  
11 side impact. We don't put it in rollover cases;  
12 because rollovers were excluded in the database  
13 analysis by Maliaris and Digges and DeBlois.

14 I put it in there because it's one of the  
15 most recent articles written where the NASS database  
16 was perused and studied and made a correlation  
17 between Delta V likelihood of fatality, PDOF  
18 likelihood of fatality and things like that.

19 Q Do you consider Exhibit 15 authoritative?

20 A Yes, sir. I don't know anything in it  
21 that I disagree with.

22 (Defendants' Exhibit No. 16 was marked for the  
23 record.)

24 BY MR. COLE:

25 Q I'm showing you what's been marked as

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